

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandra Division**

IN RE: OUTSIDEWALL TIRE LITIGATION

Civil Action No. 1:09-cv-1217 (TES/IDD)

**AFFIDAVIT OF LI XINGBING ON BEHALF OF
SHANDONG LINGLONG RUBBER CO., LTD.**

I, Li Xingbing, declare and state as follows:

1. I am the legal clerk of Shandong Linglong Rubber Co., Ltd. ("Defendant"). In such capacity, I am familiar with the operation and legal affairs of Defendant.
2. This affidavit is made pursuant to this Court's Order dated October 18, 2013.
3. We have the highest respect for the U.S. judicial system. However, Defendant failed to comply with this Court's previous Order because Defendant honestly believed that, with its usually large amount, the judgment entered in this case against Defendant was not justified.
4. Earlier this year, in May 2013, representatives of Defendant had traveled to the United States to attend a settlement meeting with the plaintiffs but failed to reach a resolution.
5. Following termination of engagement of its then U.S. counsel Morgan Lewis & Bockius, LLP in August 2013, Defendant failed to receive notice for the Motion for Sanctions Hearing held on October 18, 2013, which explains our failure to attend such hearing.
6. Although there were serious disagreements between the parties, Defendant never meant to be disrespectful of this Court. Since receipt of this Court's Order dated October 18, 2013, which was sent on October 19, 2013 via email addressed to an employee of Shandong Linglong Tire Co., Ltd., Defendant has engaged the law firm Edwards Wildman Palmer LLP as our new counsel to assist us in coming into compliance with this Court's Orders and to restart our discussions with the plaintiffs in earnest to seek an amicable resolution.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 25, 2013

Signature: _____

A handwritten signature in black ink, appearing to be "J. [unclear]", written over a horizontal line.A handwritten signature in black ink, appearing to be "J. [unclear]", written over a horizontal line.